

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Todd Klahr and Cindy Klahr : Chapter 13  
Debtors : No. : 14-11675-ref

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**Hearing to be Held:**

**Date: November 16, 2017**

**Time: 9:30 AM**

**Place: United States Bankruptcy Court  
Courtroom #1  
Third Floor, Madison Building  
400 Washington Street  
Reading, Pennsylvania, 19601**

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**NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE**

Todd Klahr and Cindy Klahr, Debtors, by and through counsel at the Law Office of the Stephen Ross P.C., have filed a Motion to Modify the Chapter 13 Plan (Post-Confirmation).

**YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE. (IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT AN ATTORNEY.)**

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before November 7, 2017, you or your attorney must do ALL of the following:

(a). file an answer explaining your position at:

United States Bankruptcy Court  
Eastern District of Pennsylvania  
400 Washington Street, Suite 300  
Reading, PA 19601

(b). If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and mail a copy to movant:

Joseph Quinn, Esquire  
Law Office of Stephen Ross, P.C.  
Security Trust Company Building  
152 E. High Street, Suite 100  
Pottstown, PA 19464

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Richard E. Fehling, United States Bankruptcy Judge on November 16, 2017 at 9:30 A.M., in:

**United States Bankruptcy Court  
Courtroom #1  
Third Floor, Madison Building  
400 Washington Street  
Reading, Pennsylvania, 19601**

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you are on the Clerk's Service List and you request a copy from the attorney named in paragraph 1(b).

5. You may contact the bankruptcy clerk's office at 610-208-5040 to find out whether the hearing has been cancelled because no one filed an answer.

**LAW OFFICE OF STEPHEN ROSS, P.C**

By: /s/ Joseph Quinn  
Joseph Quinn, Esquire  
Attorney I.D. 307467  
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Dated: October 18, 2017